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Attorneys for Defendant
RASH CURTIS & ASSOCIATES

11 *Attorneys for Plaintiff and the Class*

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

17 IGNACIO PEREZ, on Behalf of Himself and
18 all Others Similarly Situated,

Case No. 4:16-cv-03396-YGR

19 Plaintiff,

**SECOND AMENDED JOINT TRIAL
EXHIBIT LIST**

20 v.

21 RASH CURTIS & ASSOCIATES,

Date: April 29, 2019

22 Defendant.

Time: 10:00 a.m.

Courtroom 1, 4th Floor

23 Hon. Yvonne Gonzalez Rogers

1 **I. PLAINTIFFS' TRIAL EXHIBIT LIST:**

2

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
1	Perez Account RCA 001-004	Dan Correa	Yes		
2	Global Connect Manual RCA 044-120	Dan Correa	Yes		
3	Intentionally left blank.		N/A		
4	Intentionally left blank.		N/A		
6	9/28/12 Status Code Matrix	Dan Correa	Yes		
7	Intentionally left blank.		N/A		
8	2/13/16-2/18/16 emails w/ N. Keith, N. Paff, B. Keith, T. Paff re cell phones/phone fields	Nick Keith	Yes		
9	2/24/14-2/25/14 emails w/ N. Paff, N. Keith, Kizer, B. Keith, C. Paff, T. Paff re cell/phone field	Nick Keith	Yes		
10	8/3/15-8/4/15 emails w/ N. Keith, B. Keith, C. Paff, T. Paff, N. Paff re cell phone scrubs/phone fields	Nick Keith	Yes		
11	5/12/16 emails w/ N. Keith, B. Keith, C. Paff re 5+ phone fields	Nick Keith	Yes		
12	5/12/16 emails w. N. Keith, Dan Correa, Greg Wilbert re phone field 5+ custom	Nick Keith	Yes		
13	Intentionally left blank.		N/A		
14	Intentionally left blank.		N/A		
15	Intentionally left blank.		N/A		
16	Intentionally left blank.		N/A		
17	Intentionally left blank.		N/A		
18	Intentionally left blank.		N/A		
19	DAKCS Software Systems Client Services Manual	Dan Correa	Yes		
20	DAKCS Software Systems Client Services Utilities Help Manual	Dan Correa	Yes		

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
21	DAKCS Software Systems Vocality Help Manual	Dan Correa	Yes		
22	DAKCS Software Systems Vocality Beyond and Sting Setup	Dan Correa	Yes		
23	County of Solano Amendment to Request for Qualifications for Healthcare Related Debt Collection Services	Dan Correa	No	Relevance FRE 400-403	
24	Rash Curtis & Associates Collection Agency Debt Recovery Services Company Information	Dan Correa	Yes		
26	5/25/15-5/27/15 emails w. D. Correa, D. Anderson, B. Conrad, Kizer, B. Keith, C. Paff re Sutter Foti Message	Dan Correa	No	Relevance FRE 400-403	
27	9/15/15 emails w. D. Anderson, D. Correa, C. Paff, K. Boddie, B. Conrad, Kizer re skip lists	Dan Correa	Yes		
28	Intentionally left blank.		N/A		
29	5/6/13 email w. B. Kimbell, D. Correa re status code campaigns	Dan Correa	Yes		
30	Intentionally left blank.		N/A		
31	Intentionally left blank.		N/A		
32	12/11/14-12/12/14 emails w. B. North, C. Paff, D. Correa, B. Kimbell, B. Conrad re opt out list	Dan Correa	Yes		
33	12/29/16 emails w/ D. Correa, M. Paff, T. Mitchell re cease and desist call lists	Dan Correa	Yes		
34	6/29/17 emails w. T. Paff, B. Keith, C. Paff, N. Paff re 2015 FCC Ruling	Bob Keith	No	Relevance FRE 400-403	
35	Intentionally left blank.		N/A		

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
36	10/12/16 email w. B. Keith, T. Paff, C. Paff re calling cell phones	Bob Keith	No	Relevance FRE 400-403	
37	1/5/16 email from B. Keith to staff re 90 day call count	Bob Keith	Yes		
38	5/5/16-5/6/16 emails w. D. Correa, B. Keith, B. North, C. Paff re blocking fields 5+	Bob Keith	Yes		
42	8/5/13 emails w. B. Kimbell, C. Paff, D. Correa, B. Keith, Kizer re back to school month	Chris Paff	No	Relevance FRE 400-403	
43	2/28/14 email w/ A. Hyden, C. Paff re CPS questions	Chris Paff	Yes		
44	6/15/17 email w. C. paff re robocalls	Chris Paff	Yes		
45	Questions Excerpted from the FCC's Robocall Blocking NOI	Chris Paff	Yes		
46	6/30/17 Declaration of Darrin Bird, ECF Doc. No. 50-3	Darrin Bird	Yes		
47	7/3/17 Declaration of Robert Keith, ECF Doc. No. 50-2	Bob Keith	Yes		
48	DAKCS Software Systems VIC Client, Exhibit 11 to 12/11/17 Krivoshey Decl., ECF Doc. No. 139-2 DAKCS00001-266	Randall A. Snyder	No	Relevance FRE 400-403 Not specific as to which portions or pages FRE 702	
49	Intentionally left blank.		N/A		
50	Exhibit 22 to 1/8/18 Declaration of L. Timothy Fisher, ECF Doc. No. 151-1	Colin B. Weir	Yes		
51	Exhibit 23 to the 1/8/18 Declaration of L. Timothy Fisher, ECF Doc. No. 151-1	Colin B. Weir	Yes		

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
13 52	14 Exhibit 2 to 4/13/18 15 Krivoshey Decl., ECF 16 Doc. No. 190-1, RCA's 17 Opposition to Plaintiff's 18 Separate Statement of 19 Undisputed Facts in 20 Support of Summary 21 Judgment or Partial 22 Summary Judgment in 23 <i>Hernandez v. Rash Curtis</i> 24 & Associates, Case No. 25 2:16-cv-02455-GHW (E.D. Cal. Nov. 13, 2017), ECF Doc. No. 34.	26 N/A	27 No	28 Relevance FRE 400-403	29
30 53	31 5/5/16 emails w. N. Paff, 32 B. Keith, C. Paff, D. 33 Correa, T. Paff re human 34 error	35 Dan Correa	36 Yes	37	38
39 54	40 11/12/18 Supplemental 41 Declaration of Randall A. 42 Snyder	43 Randall A. 44 Snyder	45 No	46 Relevance FRE 400-403 FRE 702	47
48 55	49 11/12/18 Class Member 50 Data Tabulation Report 51 of Anya Verkhovskaya	52 Anya 53 Verkhovskaya	54 No	55 Relevance FRE 400-403 FRE 702	56
57 56	58 11/12/18 Declaration of 59 Colin B. Weir	60 Colin B. Weir	61 No	62 Relevance FRE 400-403 FRE 702	63
64 57	65 Global Connect Call 66 Detail Records, as 67 discussed by Colin Weir 68 at his 12/11/18 69 Deposition	70 N/A	71 Yes	72	73
74 58	75 VIC Call Detail Records, 76 as discussed by Colin 77 Weir at his 12/11/18 78 Deposition	79 N/A	80 Yes	81	82
83 59	84 TCN Call Detail 85 Records, as discussed by 86 Colin Weir at his 87 12/11/18 Deposition	88 N/A	89 Yes	90	91

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
60	Defendant's Account Data as discussed by Colin Weir at his 12/11/18 Deposition (including all account numbers, demographic and personal information, and phone fields one through ten)	N/A	Yes		
61	GC_calls2, as discussed at Anya Verkhovskaya's 12/6/18 Deposition	N/A	Yes		
62	TCN_calls-2, as discussed at Anya Verkhovskaya's 12/6/18 Deposition	N/A	Yes		
63	VIC_calls-2, as discussed at Anya Verkhovskaya's 12/6/18 Deposition	N/A	Yes		
64	Intentionally left blank.		N/A		
65	Defendant's Responses to Plaintiffs' First Set of Interrogatories	N/A	Yes		
66	Defendant's Responses to Plaintiffs' First Set of Requests for Production	N/A	Yes		
67	Global Connect Dialer Sample	N/A	Yes		
68	Audit checklist RCA000121-123	N/A	Yes		
69	Rash Curtis Policy & Procedure: Quality Assurance Program – audit guidelines RCA000124-135	N/A	Yes		
70	Rash Curtis Quality Assurance Program – Employee Acknowledgement RCA000164	N/A	Yes		

1 TRIAL EXHIBIT NO.	2 DESCRIPTION	3 SPONSORING WITNESS	4 STIP. TO ADMIT	5 OBJECTION	6 DATE ADMITTED
71	Defendant Rash Curtis & Associates' Responses to Plaintiff's Interrogatories (Set One) in <i>McBride v. Rash Curtis & Associates</i> , Case No. 2:16-cv-02390-TLN-CKD (E.D. Cal. July 24, 2017).	N/A	Yes	Relevance FRE 400-403	
72	Defendant Rash Curtis & Associates' Responses to Plaintiff's Interrogatories (Set One) in <i>Oliver v. Rash Curtis & Associates</i> , Case No. 2:16-cv-02413-TLN-CKD (E.D. Cal. July 24, 2017).	N/A	No	Relevance FRE 400-403	
73	Intentionally left blank.	N/A	N/A		
74	Intentionally left blank.		N/A		
75	Intentionally left blank.		N/A		
76	Account Record Abbreviations RCA000192-193	N/A	Yes		
77	Skip Tracing Instructions RCA000195-199	N/A	Yes		
78	Unredacted Perez Account Notes RCA000268-271	Dan Correa	Yes		
79	5/5/2015 email w. B. Keith to T. Paff RCA-278403	Bob Keith	Yes		
80	11/19/15 emails w. B. Keith, T. Paff, C. Paff re cell phones RCA-282301-282303	Bob Keith	No	Relevance FRE 400-403 Attorney-Client Privileged	
81	8/3/15 emails w/ B. Keith, N. Keith, C. Paff, T. Paff, N. Paff re cell phones RCA-281392	Chris Paff	No	Relevance FRE 400-403 Attorney-Client Privileged	
82	11/19/15 emails w. T. Paff, C. Paff, B. Keith re cell phones	Chris Paff	No	Relevance FRE 400-403	

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
	RCA-282306-282308			Attorney-Client Privileged	
83	5/5/16 email w. B. Keith, C. Paff, D. Correa, T. Paff, N. Paff RCA-268070	Bob Keith	No	Relevance FRE 400-403	
84	Transcript/Video Excerpts from 4/13/17 Deposition of Steven Kizer	Steven Kizer	Yes		
85	Transcript/Video Excerpts from 10/16/17 Deposition of Nick Keith	Nick Keith	Yes		
86	Transcript/Video Excerpts from 10/20/17 Deposition of Dan Correa	Dan Correa	Yes		
87	Intentionally left blank.		N/A		
88	Intentionally left blank		N/A		

II. DEFENDANT'S TRIAL EXHIBIT LIST:

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
501	Intentionally left blank.		N/A		
502	Intentionally left blank.		N/A		
503	Rash Curtis' Collection Notes/Business Records for Daniel Reynoso (RCA 268-271).	Bob Keith	Yes		
504	Daniel Reynoso's Medical Records from Sutter General Hospital (RCA 272-278).	Bob Keith	No	MIL 2, FRE 802, 403, FRCP 37	
505	May 5, 2017 Email from Bob Keith to Mike Paff attaching Sutter General Hospital's Client Notes for Daniel Reynoso (RCA 012718-012724).	Bob Keith	No	MIL 2, FRE 802, 403, 801, 803	
506	Intentionally left blank.		N/A		
507	Intentionally left blank.		N/A		
508	Intentionally left blank.		N/A		
509	Intentionally left blank.		N/A		
510	Intentionally left blank.		N/A		
511	Rash Curtis' Abbreviation Key for Collection Notes (RCA 192-193).	Bob Keith	Yes		
512	Plaintiffs' Notice of Subpoenas to Produce Documents and Subpoenas to T-Mobile USA, Inc., LexisNexis Risk Data Management, Inc., and LexisNexis Risk Solutions FL, Inc., served on April 26, 2017.	Ignacio Perez	No	FRE 401, 403	

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
13 513	14 Phone Records Produced 15 by T-Mobile (MetroPCS) 16 in Response to Plaintiffs' 17 Subpoena, produced on 18 August 16, 2017.	19 Ignacio Perez	20 Yes	21	22
23 514	24 Intentionally left blank.	25	26 N/A	27	28
29 515	30 Intentionally left blank.	31	32 N/A	33	34
35 516*	36 True and correct copies 37 of excerpts from the 38 Deposition of Nick 39 Keith, taken October 16, 40 2017.	41 Nick Keith	42 No	43 MIL 7	44
45 517*	46 True and correct copies 47 of excerpts from the 48 Deposition of Daniel 49 Correa, taken October 50 20, 2017.	51 Daniel Correa	52 No	53 MIL 7	54
55 518*	56 True and correct copies 57 of excerpts from the 58 Deposition of Chris Paff, 59 taken October 24, 2017.	60 Chris Paff	61 No	62 MIL 7	63
64 519*	65 True and correct copies 66 of excerpts from the 67 Deposition of Robert 68 Keith, taken October 24, 69 2017.	70 Robert Keith	71 No	72 MIL 7	73
74 520	75 True and correct copies 76 of excerpts from the 77 Deposition of Plaintiff 78 Ignacio Perez, taken July 79 13, 2017.	80 Ignacio Perez	81 No	82 MIL 7	83
84 521	85 True and correct copies 86 of excerpts from the 87 Deposition of Steven 88 Kizer, taken April 13, 89 2017.	90 Steven Kizer	91 No	92 MIL 7	93
94 522	95 December 20, 2018 96 Invoice from Class 97 Experts Group, LLC to	98 Anya Verkhovskaya	99 Yes	100	101

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
	Bursor & Fisher, P.A. (McMillion000099).				
523	True and correct excerpts from “5 Fuzzy Match Output Step 2 Final” (not bates-stamped).	Anya Verkhovskaya	Yes		
524	True and correct excerpts from “2018-10-16 historical 1-4 version 1 101518” Spreadsheet (not bates-stamped).	Nick Keith	Yes		
525	Plaintiffs’ Notice of Subpoena and Subpoena to Testify at a Deposition in a Civil Action to DAKCS Software Systems, Inc., served on October 11, 2017.	Ignacio Perez	No	FRE 401, 403	
526	Business Records Produced by DAKCS Software Systems, Inc. in Response to Plaintiffs’ Subpoena, produced on November 2, 2017 (DAKCS 00001-00266).	Ignacio Perez	Yes		
527	October 16, 2015 Email from Steven Kizer to Bob Keith and Chris Paff regarding Rash Curtis’ policies on skip-tracing and removing phone numbers upon Do-Not-Call requests (RCA 125254-125255).	Bob Keith	No	FRE 801, 802, 803	
528	February 28, 2014 Email from Ashlee Hyden of DAKCS Software Systems, Inc. to Chris Paff regarding cell phone scrub technology (RCA 040794).	Chris Paff	No	FRE 801, 802, 803	
529	May 16, 2016 Email from Nick Keith to	Nick Keith	No	FRE 801, 802, 803	

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
		Daniel Correa regarding GlobalConnect's outbound limitations (RCA 133979-133982).				
5	530	August 4, 2015 Email from Nick Keith to Bob Keith regarding phone numbers supplied to Rash Curtis from its creditor-clients (RCA 258388-258391).	Nick Keith/Bob Keith	No	FRE 801, 802, 803	
9	531	August 4, 2015 Email from Nick Keith to Bob Keith regarding Rash Curtis' policy to separate verified phone numbers from unverified phone numbers (RCA 258397-258400).	Nick Keith/Bob Keith	No	FRE 801, 802, 803	
14	532	December 11, 2017 Email from Randall Snyder to Yeremey Krivoshey (McMillion000013-000026).	Randall Snyder	Yes		
18	533	January 30, 2018 Email from Anya Verkhovskaya to Yeremey Krivoshey (McMillion000034).	Anya Verkhovskaya	Yes		
21	534	January 30, 2018 Email from Yeremey Krivoshey to Anya Verkhovskaya (McMillion000035).	Yeremey Krivoshey	Yes		
23	535	January 30, 2018 Email from Anya Verkhovskaya to Yeremey Krivoshey (McMillion000036).	Anya Verkhovskaya	Yes		
26	536	November 27, 2018 Email from Randall Snyder to Yeremey	Randall Snyder	Yes		

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
	Krivoshey (McMillion000053).				
537	November 28, 2018 Email from Randall Snyder to Yeremey Krivoshey (McMillion000054- 000055).	Randall Snyder	Yes		
538	December 11, 2018 Email from Rebecca Richter to Randall Snyder (McMillion000072).	Randall Snyder	Yes		
539	May 2, 2017 Email from Colin Weir to Scott Burson (McMillion000086).	Colin Weir	Yes		
540	September 5, 2017 Email from Colin Weir to Scott Burson (McMillion000087).	Colin Weir	Yes		
541	September 4, 2018 Email from Colin Weir to Scott Burson (McMillion000088).	Colin Weir	Yes		
542	January 2, 2018 Email from Colin Weir to Scott Burson (McMillion000089).	Colin Weir	Yes		
543	March 1, 2018 Email from Colin Weir to Scott Burson (McMillion000090).	Colin Weir	Yes		
544	February 1, 2018 Email from Colin Weir to Scott Burson (McMillion000091).	Colin Weir	Yes		
545	August 1, 2018 Email from Colin Weir to Scott Burson (McMillion000092).	Colin Weir	Yes		

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
13 546	14 April 2, 2018 Email from 15 Colin Weir to Scott 16 Burson 17 (McMillion000093).	18 Colin Weir	19 Yes	20	21
22 547	23 June 1, 2017 Email from 24 Colin Weir to Scott 25 Burson 26 (McMillion000094).	27 Colin Weir	28 Yes	29	30
31 548	32 December 4, 2017 Email 33 from Colin Weir to Scott 34 Burson 35 (McMillion000095).	36 Colin Weir	37 Yes	38	39
40 549	41 December 5, 2018 Email 42 from Colin Weir to Scott 43 Burson 44 (McMillion000096).	45 Colin Weir	46 Yes	47	48
49 550	50 November 1, 2018 Email 51 from Colin Weir to Scott 52 Burson 53 (McMillion000097).	54 Colin Weir	55 Yes	56	57
58 551	59 October 2, 2018 Email 60 from Colin Weir to Scott 61 Burson 62 (McMillion000098).	63 Colin Weir	64 Yes	65	66
67 552	68 December 17, 2018 69 Invoice from Wireless 70 Research Services to 71 Burson & Fisher, P.A. 72 (McMillion000076).	73 Colin Weir	74 Yes	75	76
77 553	78 November 28, 2018 79 Email from Randall 80 Snyder to Yeremey 81 Krivoshey 82 (McMillion000059- 83 000060).	84 Randall Snyder	85 Yes	86	87
88 554	89 True and correct copies 90 of excerpts from the 91 Deposition of Anya 92 Verkhovskaya, taken 93 December 6, 2018.	94 Anya 95 Verkhovskaya	96 No	97 MIL 7	98

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
13 555	14 Excerpts from the 15 Spreadsheet Associated 16 with Anya 17 Verkhovskaya's Rule 26 18 Report (Exhibit 2 to the 19 Deposition of Anya 20 Verkhovskaya).	21 Anya 22 Verkhovskaya	23 Yes	24	25
26 556	27 Notice of Deposition of 28 Anya Verkhovskaya (Exhibit 3 to the Deposition of Anya Verkhovskaya).	29 Anya 30 Verkhovskaya	31 No	32 FRE 401, 403	33
34 557	35 Declaration of Anya 36 Verkhovskaya (Exhibit 4 37 to the Deposition of 38 Anya Verkhovskaya).	39 Anya 40 Verkhovskaya	41 Yes	42	43
44 558	45 Retainer Agreement 46 between Anya 47 Verkhovskaya and 48 Burson & Fisher, P.A. (Exhibit 5 to the 49 Deposition of Anya 50 Verkhovskaya).	51 Anya 52 Verkhovskaya	53 Yes	54	55
56 559	57 Invoice 1022 from CEG 58 to Burson & Fisher, P.A. (Exhibit 6 to the 59 Deposition of Anya 60 Verkhovskaya).	61 Anya 62 Verkhovskaya	63 Yes	64	65
66 560	67 Invoice 1121 from CEG 68 to Burson & Fisher, P.A. (Exhibit 7 to the 69 Deposition of Anya 70 Verkhovskaya).	71 Anya 72 Verkhovskaya	73 Yes	74	75
76 561	77 True and correct copies 78 of excerpts from the 79 Deposition of Colin 80 Weir, taken December 81 11, 2018.	82 Colin Weir	83 No	84 MIL 7	85
86 562	87 Notice of Deposition of 88 Colin Weir (Exhibit 1 to 89 the Deposition of Colin 90 Weir).	91 Colin Weir	92 No	93 FRE 401, 403	94

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
	563	Declaration of Colin Weir (Exhibit 2 to the Deposition of Colin Weir).	Colin Weir	Yes		
	564	Engagement Agreement between Colin Weir and Bursor & Fisher, P.A. (Exhibit 3 to the Deposition of Colin Weir).	Colin Weir	Yes		
	565	November 30, 2018 Invoice from Economics and Technology, Inc. to Bursor & Fisher, P.A. (Exhibit 4 to the Deposition of Colin Weir).	Colin Weir	Yes		
	566	Further Invoices from Economics and Technology, Inc. to Bursor & Fisher, P.A. (Exhibit 5 to the Deposition of Colin Weir).	Colin Weir	Yes		
	567	Statement of Qualifications of Colin Weir (Exhibit 6 to the Deposition of Colin Weir).	Colin Weir	Yes		
	568	True and correct copies of excerpts from the Deposition of Randall Snyder, taken December 17, 2018.	Randall Snyder	No	MIL 7	
	569	Notice of Deposition of Randall Snyder (Exhibit 1 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 401, 403	
	570	Curriculum Vitae (Professional Summary) of Randall Snyder (Exhibit 2 to the	Randall Snyder	Yes		

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
	Deposition of Randall Snyder).				
571	Curriculum Vitae (Litigation Support Experience) of Randall Snyder (Exhibit 3 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
572	Wireless Research Services, LLC 2017 Rate Sheet and Retained Agreement with Burson & Fisher, P.A. (Exhibit 4 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
573	November 12, 2018 Supplemental Declaration of Randall Snyder (Exhibit 5 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
574	May 29, 2017 Invoice from Wireless Research Services, LLC to Burson & Fisher, P.A (Exhibit 6 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
575	“Exactly What Is An Autodialer?” Powerpoint Presentation (Exhibit 7 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
576	May 30, 2017 Declaration of Randall Snyder (Exhibit 9 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 403	
577	October 16, 2017 Declaration of Randall Snyder (Exhibit 10 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 403	

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
	578	December 11, 2017 Declaration of Randall Snyder (Exhibit 11 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 403	
	579	March 5, 2018 Declaration of Randall Snyder (Exhibit 12 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 403	
	580	True and Correct Excerpts from the June 20, 2017 Deposition of Steve Kizer (Exhibit 14 to the Deposition of Randall Snyder).	Randall Snyder, Steven Kizer	No	MIL 7, MIL 5, FRE 401, 403	
	581	December 11, 2017 Declaration of Bob Keith (Exhibit 15 to the Deposition of Randall Snyder).	Randall Snyder	No	MIL 5, FRE 401, 403	
	582	Intentionally left blank		N/A		
	583	Complaint for TCPA damages, styled <i>Diane Steele v. Rash Curtis & Associates</i> , United States District Court, Eastern District of California, Case No. 2:17-cv-02626-JAM-AC, filed 12/15/17.	Bob Keith	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	584	Medical account overview from Contra Costa Regional Medical Center for Steven Milligan, showing the 925-435-6429 phone number and that the account was assigned to Rash Curtis for collection.	Bob Keith	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	585	Medical account overview for Diane Steele, showing the 925-	Bob Keith	No	FRCP 37, FRE 401, 403, 802,	

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
		435-6429 phone number and that the account was assigned to Rash Curtis for collection.			Scheduling Order (ECF 246)	
5	586	True and Correct Excerpts from the June 20, 2017 Deposition of Steven Kizer from <i>Rash Curtis & Associates, Inc. v. Steven Kizer</i> , Superior Court of the State of California County of Solano Case No. FCS048565.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
11	587	True and Correct Excerpts from the July 6, 2017 Deposition of Steven Kizer from <i>Rash Curtis & Associates, Inc. v. Steven Kizer</i> , Superior Court of the State of California County of Solano Case No. FCS048565.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
16	588	Complaint for the Labor Commissioner's Office filed by Steven Kizer against Rash Curtis, State Case No. 08-78737, filed September 16, 2016	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
20	589	Final Order and Decision in Kizer's Labor Board case against Rash Curtis, State Case No. 08-78737, dated August 22, 2018.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
23	590	Kizer's "Notice of Claim" and time/wages claimed in State Case No. 08-78737, dated January 20, 2017.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
26	591*	Personnel Action Form for Steven Kizer, signed by Steven Kizer on December 1, 2012.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
	592*	Inbound Phone Line; Expectations and Rules, signed by Steven Kizer on July 2, 2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	593*	Certificate of Completion – Workplace Harassment: Prevention and the law-Supervisor Field 120, certifying Steven Kizer's completion on May 28, 2013.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	594*	Policy & Procedure: Harassment Free Workplace ("Management"), signed by Steven Kizer on March 17, 2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	595*	Interoffice Memo to exempt employees, signed by Steven Kizer on December 17, 2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	596*	Kizer email dated May 26, 2016.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	597*	Payroll Summary re Steven Kizer 12/2012 – 12/2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	598*	Kizer email with self-authored Biography, dated May 6, 2013	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	599*	Work Order Guidelines issued by Steven Kizer dated March 12, 2013.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
3 600*	4 Steven Kizer's resume	5 Steven Kizer	6 No	7 FRCP 37, FRE 8 401, 403, 802, 9 Scheduling 10 Order (ECF 246)	11
6 601*	7 Steven Kizer's IT Job 8 Description.	9 Steven Kizer	10 No	11 FRCP 37, FRE 12 401, 403, 802, 13 Scheduling 14 Order (ECF 246)	15
8 602*	9 Steven Kizer's LinkedIN 10 Resume	11 Steven Kizer	12 No	13 FRCP 37, FRE 14 401, 403, 802, 15 Scheduling 16 Order (ECF 246)	17
11 603*	12 Steven Kizer's internal 13 email communications at 14 Rash Curtis	15 Steven Kizer	16 No	17 FRCP 37, FRE 18 401, 403, 802, 19 Scheduling 20 Order (ECF 246)	21
13 604*	14 Excerpts from Steven 15 Kizer's 16 Absence/Schedule 17 Adjustment Request 18 Forms	19 Steven Kizer	20 No	21 FRCP 37, FRE 22 401, 403, 802, 23 Scheduling 24 Order (ECF 246)	25
16 605*	17 Steven Kizer's Paid Time 18 Off Statements	19 Steven Kizer	20 No	21 FRCP 37, FRE 22 401, 403, 802, 23 Scheduling 24 Order (ECF 246)	25
19 606*	20 Email re Steven Kizer's 21 FMLA/CFRA Leave, 22 dated March 21, 2016	23 Steven Kizer	24 No	25 FRCP 37, FRE 26 401, 403, 802, 27 Scheduling 28 Order (ECF 246)	29
21 607	22 Comparison Exhibits re 23 wage claims and PTO	24 Steven Kizer	25 No	26 FRCP 37, FRE 27 401, 403, 802, 28 Scheduling 29 Order (ECF 246)	30

1 Dated: April 26, 2019

Respectfully submitted,

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16 Dated: April 26, 2019

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